

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, Both)
individually and as Legal Guardian of)
Shane Allen Loveland; and JACOB)
SUMMERS)

Plaintiff(s),)

CASE NO. 8:18CV127

**PLAINTIFFS' PROPOSED
VERDICT FORM**

THE GOODYEAR TIRE & RUBBER)
COMPANY)

Defendant(s).)

1. Was Goodyear negligent with respect to the design of the subject tire?

YES: _____ NO: _____

If you answered "YES" to Question 1, then answer question 2.

If you answered "NO" to Question 1, then skip Question 2. Answer Question 3.

2. Was Goodyear's negligence a proximate cause of Plaintiffs' injuries?

YES: _____ NO: _____

3. Was the subject tire defective in design?

YES _____ NO _____

If you answered "YES" to Question 3, then answer question 4.

If you answered "NO" to Question 3, then skip Question 4. Answer Question 5.

4. Was such defective design of the subject tire a proximate cause of Plaintiffs' injuries?

YES _____ NO _____

5. Was the subject tire defective in manufacture?

YES _____ NO _____

If you answered "YES" to Question 5, then answer question 6.

If you answered "NO" to Question 5, then skip Question 6. Answer Question 7.

6. Was such defective manufacture of the subject tire a proximate cause of Plaintiffs' injuries?

YES _____ NO _____

7. What sum of money, if any, will fairly and adequately compensate Plaintiff Shane Loveland for damages resulting from the injuries sustained on May 1, 2015 up to the date of verdict?

- a. Past pain, disability, disfigurement, and emotional distress: \$ _____
- b. The reasonable value of medical expenses
and medical supplies, attendant care, and
all attendant care expenses: \$ _____

8. What sum of money, if any, will fairly and adequately compensate Plaintiff Shane Loveland for future damages reasonably certain to occur as a result of the harm sustained in the occurrence on May 1, 2015 for:

- a. Pain, disability, disfigurement, and emotional distress: \$ _____
- b. The reasonable value of medical expenses
and medical supplies, attendant care, and
all attendant care expenses: \$ _____
- c. Diminished earning capacity: \$ _____

9. What sum of money, if any, will fairly and adequately compensate Plaintiff Jacob Summers for damages resulting from the injuries sustained on May 1, 2015 up to the date of verdict?

- a. Past pain, disability, disfigurement, and emotional distress: \$ _____
- b. The reasonable value of medical expenses
and medical supplies, attendant care, and

all attendant care expenses: \$ _____

10. What sum of money, if any, will fairly and adequately compensate Plaintiff Jacob Summers for future damages reasonably certain to occur as a result of the harm sustained in the occurrence on May 1, 2015 for:

a. Pain, disability, disfigurement, and emotional distress: \$ _____

b. The reasonable value of medical expenses
and medical supplies, attendant care, and
all attendant care expenses: \$ _____

c. Diminished earning capacity: \$ _____

If you awarded compensatory damages in Question 8, 9, 10, or 11, answer Questions 12-13.

If you did not award compensatory damages in Question 8, 9, 10, or 11, do not answer any more questions.

11. Do you find that Plaintiffs are entitled to punitive damages??

YES _____ NO _____

If yes, state the amount of punitive damages.

Punitive Damages: \$ _____

12. If the jury decides that the Defendant is liable for punitive damages, provide whether attorney fees and costs should be awarded against the Defendant?

YES _____ NO _____